

Keith J. Miller, Esq. (KM/9988)  
ROBINSON & LIVELLI  
Two Penn Plaza East  
Newark, New Jersey 07105  
(973) 690-5400

Alan M. Grayson, Esq. (*pro hac vice*)  
Victor A. Kubli, Esq. (*pro hac vice*)  
GRAYSON & KUBLI, P.C.  
1420 Spring Hill Road, Suite 230  
McLean, Virginia 22102  
(703) 749-0000

Attorneys for Plaintiff/Relator Phil Hefner

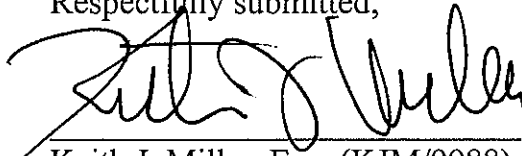
UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA, <i>ex rel.</i>	:	Civ. No. 01-4078 (DMC)
HEFNER,	:	Hon. Dennis M. Cavanaugh
	:	
Plaintiff/Relator,	:	CIVIL ACTION
	:	
vs.	:	<b>NOTICE OF MOTION</b>
	:	<b>FOR ALTERNATIVE</b>
HACKENSACK UNIVERSITY MEDICAL	:	<b>REMEDY ORDER</b>
CENTER, <i>et al.</i> ,	:	<b>PURSUANT TO</b>
	:	<b><u>31 U.S.C. § 3730(B)(5)</u></b>
Defendants.	:	FILED ELECTRONICALLY
	:	Return Date: February 14, 2006

PLEASE TAKE NOTICE that on February 14, 2006, or as soon thereafter as counsel may be heard, before the Honorable Dennis M. Cavanaugh, U.S.D.J. at the United States District Court for the District of New Jersey, United States Post Office and Courthouse Building, Federal Square, Newark, New Jersey, Plaintiff/Relator in the above-entitled action will move the Court for an Order granting it's Motion for Alternative Order Pursuant to 31 U.S.C. § 3730(B)(5);

PLEASE TAKE FURTHER NOTICE that Plaintiff/Relator will rely on the Brief submitted herewith and as well as other pleadings on file in this case.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Keith J. Miller", written over a horizontal line.

Keith J. Miller, Esq. (KJM/9988)

ROBINSON & LIVELLI

Two Penn Plaza East

Newark, New Jersey 07105

(973) 690-5400

(973) 466-2760 fax

Counsel for Plaintiff/Relator

Dated: January 11, 2006

Of Counsel:

Alan M. Grayson, Esq. (*pro hac vice*)

Victor A. Kubli, Esq. (*pro hac vice*)

GRAYSON, KUBLI & HOFFMAN, P.C.

1420 Spring Hill Road, Suite 230

McLean, Virginia 22102

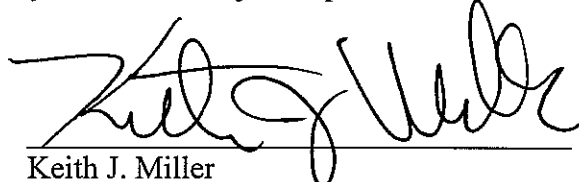
(703) 749-0000

(703) 442-8672 (fax)

CERTIFICATE OF SERVICE

On January 11, 2006, I served copies of Notice of Motion, Brief In Support Of Relator's Motion For Alternative Remedy Order Pursuant to 31 U.S.C. § 3730(B)(5) and Proposed Order via electronic filing through the Court's CM/ECF website upon counsel for Defendant Hackensack University Medical Center, John Jackson Esq., Kalison, McBride, Jackson & Murphy, P.A., 25 Independence Boulevard, Warren, New Jersey 07059; and upon counsel for Defendant North Jersey Primary Care Associates, P.A., John H. Schmidt, Jr., Lindabury, McCormick & Estabrook, P.A., 53 Cardinal Drive, P.O. Box 2369, Westfield, New Jersey 07091; and upon Richard B. Robins, Esq., Wolf, Block, Schorr and Solis-Cohen, LLP, 101 Eisenhower Parkway, Roseland, New Jersey 07068-1067, counsel for Defendant Center for Infectious Diseases, P.A.; and upon Stuart Mankowitz, AUSA, United States Attorney's Office, 970 Broad Street, 7<sup>th</sup> Floor, Newark, New Jersey 07102, counsel for plaintiff United States of America.

I certify that the forgoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.



Keith J. Miller

Dated: January 11, 2006